IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

)
) Civil Action No.
) 04-cv-10357-RCL
)

MOTION OF HANANEL FOR LEAVE TO REPLY

Defendant Moshe Hananel ("Hananel") requests leave to reply to the Memorandum and Affidavits filed by Plaintiff Sheldon Adelson ("Adelson") in opposition to Hananel's motions to dismiss for lack of personal jurisdiction and for forum non conveniens. (Adelson has not opposed Hananel's motion to stay proceedings in the alternative to dismissal.) As grounds, Hananel says that his Reply Memorandum submitted herewith will serve to highlight the uncontested facts and legal issues, and assist in resolving the disputed issues, and that the Second Hananel Affidavit submitted herewith will bring recent actions by the Israeli court before this Court and will provide additional documentary evidence of relevant facts which the opposition affidavits evade. Further, counsel for the parties have conferred and Adelson has agreed not to oppose this motion for leave.

WHEREFORE the Court should grant Hananel leave to file his Reply Memorandum and Second Affidavit submitted herewith.

Dated: August 4, 2004

MOSHE HANANEL

James A. G. Hamilton (MA Bar # 218760)

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